

## **Exhibit A**

<b>Topic</b>	<b>Committee's Position</b>	<b>Nonproducing Parties' Position</b>
<b>PRIVILEGE</b>		
Deliberative Process Privilege	Government Parties are not entitled to assert a deliberative process privilege over documents and communications concerning the negotiations of and/or decision to enter into the RSA.	Government Parties are entitled to assert deliberative process privilege over documents and communications concerning the negotiations of and/or decision to enter into the RSA.
Common Interest Privilege	Government Parties, Assured, and Ad Hoc Group are entitled to assert a common interest privilege starting May 3, 2019.	<p>Government Parties and Ad Hoc Group are entitled to assert a common interest privilege starting July 30, 2018.</p> <p>Assured and Ad Hoc Group are entitled to assert a common interest privilege starting October 18, 2018.</p> <p>Government Parties, Ad Hoc Group, and Assured are entitled to assert a common interest privilege regarding the RSA starting March 26, 2019.</p>
<b>CUSTODIANS</b>		
Oversight Board Custodians	Each of the seven members of the Oversight Board should be a document custodian.	None of the members of the Oversight Board should be a document custodian.
AAFAF/PREPA Custodians	<p>In addition to Christian Sobrino, each of the following AAFAF and PREPA personnel should be a document custodian:</p> <ul style="list-style-type: none"> <li>- José Ortiz (PREPA's CEO)</li> <li>- Gerardo Loran Butron (member of PREPA transformation team)</li> <li>- Eli Atienza Diaz (chairman of PREPA's board)</li> <li>- Nelson Morales (PREPA's CFO)</li> <li>- One or more persons at Filsinger</li> </ul>	Christian Sobrino should be the only AAFAF/PREPA official (now former official) who is a document custodian.
Ad Hoc Group Custodians	The Ad Hoc Group should produce documents from (1) the most senior responsible professional, and (2) the professional most involved on a day-to-day basis, at Blue Mountain and Knighthead, two Ad Hoc Group member funds.	The Ad Hoc Group should not produce documents from any of its members.

<b>DOCUMENTS OTHER THAN OFFICIAL EMAIL COMMUNICATIONS</b>		
	In addition to communications through official email accounts, all parties should produce other electronic communications, including emails from other email accounts, text messages, and chat messages, and hard copy documents for each custodian.	Only official email electronic communications should be produced for each custodian.
<b>DOCUMENTS PRODUCED BY GOVERNMENT PARTIES IN RECEIVERSHIP LITIGATION</b>		
	All documents produced by Government Parties as part of the receivership litigation should be considered produced as part of the 9019 Motion litigation.	Documents produced by Government Parties as part of the receivership litigation should be considered produced as part of the 9019 Motion if (1) specifically identified by a producing party as produced, or (2) agreed to by a producing party after a meet and confer with the Committee.
<b>AAFAF/PREPA's DOCUMENT REVIEW</b>		
	AAFAF and PREPA should complete a comprehensive review of potentially responsive documents, producing non-privileged documents and provide a privilege log identifying withheld materials.	AAFAF and PREPA are entitled to refuse to collect or review certain categories of potentially responsive documents, including internal communications and communications with Supporting Bondholders during certain time periods.
<b>ASSURED'S LOSS RESERVES</b>		
	Assured should produce loss reserve information provided to the New York State Department of Financial Services	Assured is entitled to withhold loss reserve information provided to the New York State Department of Financial Services.

<b>CATEGORIES OF DOCUMENTS AND 30(b)(6) DEPOSITION TESTIMONY IN DISPUTE</b>	
<p><b><u>FOMB, AAFAF, PREPA 1st RFP, No. 4:</u></b> All documents and communications concerning Your analysis of the impact of the RSA on creditors of PREPA other than the Supporting Holders and their recoveries under a plan of adjustment, including documents and communications relating to the Oversight Board's, AAFAF's, and/or PREPA's analysis regarding whether the RSA leaves all other creditors unaffected, as referred to in paragraph 65 of the Rule 9019 Motion.</p>	
<p><b>Committee's Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.</p>	<p><b>Oversight Board's Position:</b> Oversight Board will produce limited documents, including any relevant "analyses" that may exist, but not other documents, and the Oversight Board will not produce related communications.</p>
<p><b><u>FOMB, AAFAF, PREPA 1st RFP, No. 5:</u></b> All documents received and considered by You in determining whether to enter into the Settlement.</p>	
<p><b>Committee's Position:</b> Resolved per paragraph 31 of the Government Parties' opposition to the Committee's initial motion to compel.</p>	<p><b>Government Parties' Position:</b> Resolved per paragraph 31 of the Government Parties' opposition to the Committee's initial motion to compel.</p>
<p><b><u>FOMB, AAFAF, PREPA 1st RFP, No. 8:</u></b> All documents and communications concerning any alternative restructuring or litigation strategies or transactions considered by the Oversight Board, AAFAF, and/or PREPA, as referred to in paragraph 50 of the Rule 9019 Motion.</p>	
<p><b><u>FOMB, AAFAF, PREPA Topic 4:</u></b> Alternative restructuring or litigation strategies or transactions considered for PREPA, including without limitation any alternative strategies or transactions that would have provided value to PREPA's unsecured creditors.</p>	
<p><b>Committee's Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.</p> <p>Government Parties should produce witnesses to testify to this topic.</p>	<p><b>Government Parties' Position:</b> Government Parties will produce no documents responsive to this request.</p> <p>Government Parties will not produce witnesses to testify to this topic.</p>

<p><b>FOMB, AAFAF, PREPA 1st RFP, No. 9:</b> All documents and communications concerning the Oversight Board’s, AAFAF’s, and/or PREPA’s analysis of the ability of Puerto Rico’s electric system to absorb and pass on the Settlement Charge and Transition Charge, as referred to in paragraph 9 of the Rule 9019 Motion.</p>	
<p><b>FOMB, AAFAF, PREPA Topic 6:</b> The ability of Puerto Rico’s electric system to absorb and pass on the Settlement Charge and the Transition Charge – as referred to in paragraph 9 of the Rule 9019 Motion – as well as any other or additional rate surcharges, and the impact of the Settlement on the cost of electricity for PREPA’s customers.</p>	
<p><b>Committee’s Position:</b> The Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.</p> <p>Government Parties should produce witnesses to testify to this topic.</p>	<p><b>Government Parties’ Positions:</b> Oversight Board will produce limited documents, including any relevant “analyses” that may exist, but not other documents, and the Oversight Board will not produce related communications. AAFAF and PREPA have objected to producing responsive documents.<sup>1</sup></p> <p>Government Parties will not produce witnesses to testify to this topic.</p>
<p><b>FOMB, AAFAF, PREPA 1st RFP, No. 10:</b> All documents and communications concerning the statements in paragraph 1 of the Rule 9019 Motion that (i) “transformation of PREPA into a dependable and efficient energy provider will be facilitated by resolution of PREPA’s debt,” (ii) “clarity as to PREPA’s exit from Title III will reduce complexities in and challenges to the agreements related to the transformation, including investments in PREPA to fund the transformation,” and (iii) “[d]elaying the debt restructuring may . . . delay PREPA’s transformation, to the detriment of Puerto Rico, its people, its businesses, and its creditors.”</p>	
<p><b>Committee’s Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.</p>	<p><b>Government Parties’ Position:</b> Oversight Board will produce documents that “refer to the effect of the RSA on the proposed transformation.” AAFAF and PREPA will produce certain specified documents previously produced as part of the renewed receivership litigation. All other documents should be produced by non-party P3 Authority.</p>

<sup>1</sup> The Committee has requested that AAFAF/PREPA clarify whether the position articulated on p.11 of their July 23, 2019 Opposition reflects a change to this objection to RFP No. 9.

<b>FOMB, AAFAF, PREPA 1st RFP, No. 11:</b> All documents and communications concerning the effect, if any, of the Settlement on the Proposed Transformation, including all documents and communications concerning the statement in paragraph 64 of the Rule 9019 Motion that the RSA “will facilitate the PREPA transformation process.”	
<b>Committee’s Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.	<b>Government Parties’ Position:</b> Oversight Board will produce documents that “refer to the effect of the RSA on the proposed transformation.” AAFAF and PREPA will produce certain specified documents previously produced as part of the renewed receivership litigation. All other documents should be produced by non-party P3 Authority.
<b>FOMB, AAFAF, PREPA 1st RFP, No. 12:</b> All documents and communications concerning the current state and estimated date for completion of the Proposed Transformation.	
<b>Committee’s Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.	<b>Government Parties’ Position:</b> Oversight Board will produce documents that “refer to the effect of the RSA on the proposed transformation.” AAFAF/PREPA will produce certain specified documents previously produced as part of the renewed receivership litigation. All other documents should be produced by non-party P3 Authority.
<b>FOMB, AAFAF, PREPA 1st RFP, No. 17:</b> All documents and communications exchanged between You and the Puerto Rico Energy Bureau concerning the Settlement Charge and/or the Transition Charge.	
<b>Committee’s Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.	<b>Government Parties’ Position:</b> Government Parties will produce no documents responsive to this request.

<p><b>FOMB, AAFAF, PREPA 1st RFP, No. 18:</b> All documents and communications exchanged between You and the Puerto Rico legislature concerning the Settlement Charge and/or the Transition Charge.</p>	
<p><b>FOMB, AAFAF Topic 10; PREPA Topic 11:</b> The nature and status of any legislation or regulatory approval necessary for the implementation of the RSA or Settlement.</p>	
<p><b>Committee's Position:</b> Government Parties should produce all documents exchanged with the legislature concerning regulatory or legislative implementation issues implicated by the RSA.</p> <p>Government Parties should produce witnesses to testify to this topic.</p>	<p><b>Government Parties' Position:</b></p> <p>Government Parties will produce no documents responsive to this request.</p> <p>Government Parties will not produce witnesses to testify to this topic.</p>
<p><b>FOMB, AAFAF, PREPA 1st RFP, No. 19:</b> All documents and communications concerning any legislation that would need to be passed to implement the Settlement Charge, the Transition Charge, or any other aspect of the Settlement, including documents and communications concerning the status of such legislation and any alternative plans or strategies in the event such legislation is not passed.</p>	
<p><b>Committee's Position:</b> Government Parties should produce all documents concerning the current status of any regulations or legislation required by the RSA and any alternative plans or strategies in the event such regulations or legislation is not passed.</p>	<p><b>Government Parties' Position:</b> Government Parties will produce no documents responsive to this request.</p>
<p><b>FOMB, AAFAF, PREPA 1st RFP, No. 20:</b> All documents and communications concerning the nature, extent, and value of any security interest that PREPA bondholders hold in assets of PREPA, including the extent to which the value of such security interest has decreased since PREPA's title III petition date.</p>	
<p><b>Committee's Position:</b> Government Parties should produce all responsive documents that can be located following a reasonable and appropriate search.</p>	<p><b>Government Parties' Position:</b> Government Parties will produce no documents responsive to this request, aside from those publicly available.</p>

<p><b><u>FOMB, AAFAF, PREPA 1st RFP, No. 25:</u></b> All documents and communications consisting of any spreadsheets or models concerning projected revenues from the sale of electricity or other revenue sources in Puerto Rico.</p>	
<p><b>Committee's Position:</b> AAFAF and PREPA should produce all responsive documents that can be located following a reasonable and appropriate search.</p>	<p><b>Government Parties' Position:</b> Oversight Board has agreed to produce documents sufficient to show its responsive analyses and forecasts that are the subject of this request.</p> <p>AAFAF/PREPA have only agreed to produce such documents to the extent that they were already produced in connection with the Receiver Motion, and have otherwise indicated that the Committee should rely entirely on Ankura to produce such documents.</p>
<p><b><u>FOMB, AAFAF, PREPA 1st RFP, No. 26:</u></b> All documents and communications concerning projected demand forecasts, sales forecasts, electricity pricing forecasts, and related assumptions for electricity in Puerto Rico, including the effect, if any, of the Settlement (including the Settlement Charge and/or the Transition Charge) on such forecasts, pricing, and assumptions, and any spreadsheets or models concerning the same.</p> <p><b><u>FOMB, AAFAF Topic 9; PREPA Topic 10:</u></b> Your analysis concerning projected demand forecasts, sales forecasts, revenue forecasts, electricity pricing forecasts, and related assumptions for electricity in Puerto Rico, including the effect, if any, of the Settlement (including the Settlement Charge and/or the Transition Charge) on such forecasts and assumptions.</p>	
<p><b>Committee's Position:</b> AAFAF and PREPA should produce all responsive documents that can be located following a reasonable and appropriate search.</p> <p>Government Parties should produce witnesses to testify to this topic.</p>	<p><b>Government Parties' Position:</b> Oversight Board has agreed to produce documents sufficient to show its responsive analyses and forecasts that are the subject of this request.</p> <p>AAFAF/PREPA have only agreed to produce such documents to the extent that they were already produced in connection with the Receiver Motion, and have otherwise indicated that the Committee should rely entirely on Ankura to produce such documents.</p> <p>Government Parties will not produce witnesses to testify to this topic.</p>

<p><b>FOMB 2nd RFP, No. 11 AAFAF, PREPA 2nd RFP, No. 9:</b> All economic and financial models supporting the figures provided in PREPA’s June 27, 2019 Certified Fiscal Plan.</p> <p><b>FOMB, AAFAF Topic 11; PREPA Topic 12:</b> PREPA’s current and future net revenues and expenses<sup>2</sup>.</p>	
<p><b>Committee’s Position:</b> Government Parties should provide the economic and financial models supporting the certified fiscal plan.</p> <p>Government Parties should produce witnesses to testify to this topic.</p>	<p><b>Government Parties’ Position:</b> Government Parties will produce no documents responsive to this request.</p> <p>Government Parties will not produce witnesses to testify to this topic.</p>

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<sup>2</sup> The Committee continues to meet and confer with the Government Parties concerning FOMB/AAFAF Topic No. 12/PREPA Topic No. 13, concerning “The funds and accounts described in the Trust Agreement and all revenues in such funds and accounts from the PREPA title III petition date to the present.”